

Heller Ehrman LLP
Attorney Docket No. 40296-0034

U.S. Serial No. 10/629,745
Hcc Bok KANG

REMARKS

The Office Action dated 16 March 2005 has been reviewed, and the comments of the Patent Office considered. Claims 1-15 remain as originally filed. Claims 1-15 are respectfully submitted for reconsideration by the Examiner.

The Examiner is thanked for allowing claims 1-14.

Claim 15 was rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,253,302 to MacWilliams et al. ("MacWilliams"). This rejection is respectfully traversed insofar as MacWilliams fails to teach each and every element recited in Applicant's claim 15.

First, Applicant's claim 15 recites a composite memory device comprising a combination of elements "wherein the plurality of memory devices are controlled by an external memory controller to exchange data with an external system bus." In contrast, the plurality of memory devices 266 and 268 of MacWilliams exchange data with external memory system bus 208 via internal processor bus 212. Accordingly, MacWilliams fails to teach or disclose these recited elements.

Second, claim 15 recites "an external memory controller." While the Examiner asserts that this limitation is met by cluster manager 207, Figure 2 of MacWilliams discloses cluster manager 207 is internal to the cluster 201. Accordingly, Applicant respectfully submits that MacWilliams fails to teach or disclose the "external memory controller" recited in claim 15.

Third, it is not possible for MacWilliams' memory 266 and device 268 to communicate with each other when the memory 266 communicates with MacWilliams' memory system bus 208. This is in contrast to the assertion in the Office Action that "when one [266] of the plurality of memory devices exchanges data with the external system bus [208], the rest of the memory devices are allowed to exchange data via the memory bus."

Thus, for at least any of these reasons, it is respectfully submitted that MacWilliams fails to teach each and every feature recited in Applicant's claim 15.

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Therefore, it is respectfully submitted that the rejection under 35 U.S.C. § 102(b) of claim 15 should be withdrawn.

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CONCLUSION

In view of the above remarks, Applicant respectfully requests that all objections and rejections be withdrawn and that a notice of allowance be forthcoming. The Examiner is invited to contact the undersigned for any reason related to the advancement of this case.

Respectfully submitted,

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